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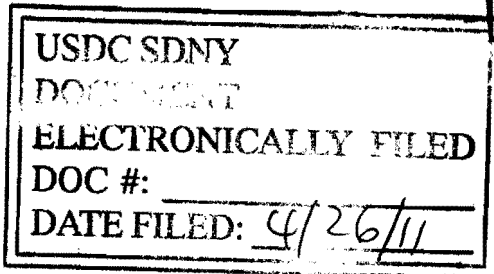
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April 21, 2011

BY EMAIL AND FACSIMILE

Hon. Alvin K. Hellerstein
United States District Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

SO ORDERED.

April 25, 2011

Re: *In Re: World Trade Center Disaster Site Litigation*
C.A. 21 MC 100/102/103 (AKH), USDC, SDNY
WTC Post – 9/11/2001 Clean-up Cover
Primary Marine Liability Policy Nos.: HF9604A00/HF0728A00
Excess Marine Liability Policy Nos.: 02-093-01/02-0918-01
Our File No.: 42376-0901142

Dear Judge Hellerstein:

We represent the Underwriters of the above referenced Primary Marine Liability Policies, and we write on behalf of the Underwriters of the above referenced Policies, both Primary and Excess (the "Marine Insurers"), and together with counsel to the WTC Captive Insurance Company, Inc. ("WTC Captive") and Plaintiffs' Counsel to request an adjournment of the deadline for the Marine Insurers and the WTC Captive to submit reply papers, as directed in Your Order dated April 4, 2011.¹ The reply papers were originally due April 14, 2011. By Order dated April 13, 2011, at the joint request of the Marine Insurers and the WTC Captive, the Court adjourned the deadline for reply submissions to April 22, 2011. The Marine Insurers, Plaintiffs' Counsel and the WTC Captive now make this second joint request to adjourn the deadline for reply submissions to April 29, 2011.

All sides have engaged in good faith negotiations to reach an agreement and are close to resolution, but minor issues remain, and, particularly in view of the approaching holidays, we feel that additional time is warranted. The Marine Insurers and the WTC Captive believe that their efforts would be better directed toward continuing their good faith negotiation and collaboration, and not briefing a dispute that has now been substantially resolved.

¹ We note that the Marine Insurers and the WTC Captive are not parties to any of the litigations that are consolidated in the above referenced Master Dockets.

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We thank the Court for its consideration of this request.

Respectfully submitted,

CLYDE & CO US LLP

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By: *Andrew J. Geng/BJS*

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